

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Carrier Current Systems, including Broadband)
over Power Line Systems)

Comments on behalf of the Power Line)
Communications Association (by Troutman)
Sanders, LLP, Council for the PLCA))

Amendment of Part 15 regarding new requirements)
And measurement guidelines for Access Broadband)
over Power Line Systems)

ET Docket No. 04-37

REPLY COMMENTS OF
JOHN ALBERT PERLICK

Dated 10-04-2004

The writer received a Bachelors of Science in Electrical Engineering from University of Minnesota, 1978 and has been worked as an electrical engineer in the field of communications and radar equipment engineering for 27 years. The writer is a Senior Member of the Institute of Electrical and Electronic Engineers, has authored several patents, and has owned and operated a small electronics business, Aria Corporation, for 14 years. The writer has no pecuniary interest in any aspect of the broadband industry. The writer has held an amateur radio license for 35 years.

On October 1, 2004, the Power Line Communication Association (PLCA) filed additional comments in ET Docket 04-37. The writer offers these comments to the FCC for its consideration.

The FCC Is Not A Business Entity

The PLCA clearly covets FCC promotion of Broadband over Power Line (BPL) service.

To quote the PLCA, *“The Commission’s challenge is to balance the rights of its existing licensees with the practicality and economic incentive (i.e. the business case) for commercial BPL operators to deploy the technology and provide cost effective solutions to consumers.”*

The FCC is not in the BPL business. From the FCC’s website, The FCC . . . is charged with regulating interstate and international communications by radio, television, wire, satellite and cable.

To suggest that the FCC must make the business case for BPL is corruption of the governing process. It is the challenge of the BPL business community to establish and sustain the economic viability of BPL.

Several Technologies now compete to offer Broadband Services

The PLCA further writes: *“PLCA is concerned that a series of ex parte filings made with the Commission may jeopardize the Commission’s vision of creating a third, viable broadband alternative for delivering cost affordable and highly available broadband services throughout the nation.”*

We assume the PLCA believes the first two broadband services are cable and DSL, as they indeed command the largest installed base today. But BPL is not the third viable broadband service. It isn’t even the fourth.

Fiber-To-The-Home (FTTH) is successfully deployed in many communities and provides broadband service with virtually unlimited bandwidth. And dozens of wireless broadband services are in place or being developed.

So, today, we have the following broadband options available:

- Broadband Cable
- DSL
- Fiber-To-The-Home
- Wireless
- BPL

To suggest, as the PLCA does, that BPL is critical to the “Commission’s vision of delivering cost effective and highly available broadband services throughout the nation” is deceitful. BPL today competes with four other, well-established broadband services.

The wireless broadband industry likely gives the BPL industry its greatest challenge. Wireless negates BPL’s singular advantage—the elimination of a separate, dedicated communication channel (such as a fiber, coax or phone line). BPL users need only plug into a wall outlet. Wireless goes one step further—eliminating the outlet.

BPL Technology Roadmap

Little has been said of the future of BPL. One must understand that, like all industries, BPL has a limited lifetime.

Given the tremendous technological challenge of transmitting broadband signals over power lines, it is impossible that BPL will maintain pace with consumer bandwidth demands. Other competing technologies, such as wireless, cable or fiber, are far more capable of delivering the massive bandwidths needed by streaming video and internet telephone users. BPL is simply incapable of providing sufficient bandwidth to a population of users simultaneously streaming video.

In light of the rapid growth of wireless broadband services, the window of viability for BPL may close within a year or two. At that time, ubiquitous wireless services will be offered in competition with BPL. And, because wireless broadband technology is less expensive to deploy, it could spell an early end to BPL.

Broadband is a very competitive industry. Cable and DSL broadband service providers fiercely fight for customers. This is good for the nation—keeping prices low and availability high. BPL is entering this competition with a weak, problematic technology.

We close with three key points for the FCC:

1. The BPL industry must make their own business case.
2. Cable, DSL, Fiber and Wireless provide broadband today—there are plenty of alternatives now.
3. BPL is, at best, viable for a couple of years before it will be out-convenienced, out-dated, and out-competed by wireless broadband.

We heartily recommend that the Commission quit wasting its time with BPL and move on to more promising technologies.

Respectfully submitted;

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